

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA**

ANNE WHITE HAT, RAMON MEJÍA,
and KAREN SAVAGE,

x

Plaintiffs,

v.

Civil Action No. 6:20-cv-00983

BECKET BREAUX, in his official
capacity as Sheriff of St. Martin Parish;
BO DUHÉ, in his official capacity as District
Attorney of the 16th Judicial District Attorney's
Office,

JUDGE ROBERT R. SUMMERHAYS

MAGISTRATE JUDGE
CAROL B. WHITEHURST

Defendants.

X

**DECLARATION OF WILLIAM QUIGLEY
IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, WILLIAM QUIGLEY, declare and state as follows:

1. I am an attorney and counsel to Plaintiffs in the above-captioned case and submit this declaration in support Plaintiffs' Motion for Summary Judgment. (Spees Decl. Ex. I).
2. I have also represented other people who were arrested and charged with violating La. R.S. 14:61, unauthorized entry of a critical infrastructure, after it was amended in 2018.
3. To my knowledge, seventeen people were arrested and charged in the weeks after the amendments went into effect; I represented all of them with respect to the criminal charges.
4. These charges were later rejected by the District Attorney in July, 2021, who disavowed any intent to prosecute them.
5. I also previously represented Peter Aaslestad and Theda Larson Wright, who were plaintiffs in this action until they were dismissed from the case on standing grounds.

6. Mr. Aaslestad and Ms. Wright co-owned the land where Plaintiffs were arrested and charged with violating La. R.S. 14:61. It is referred to as Bayou Chene.

7. Ms. Wright and Mr. Aaslestad asked me to communicate with the St. Martin Parish Sheriff and other officials to express their permission for people protesting the Bayou Bridge Pipeline to be on their property, and to express their opposition to Bayou Bridge pipeline workers and employees being on their property.

8. As requested, I sent communications to the sheriff, local district attorney, the governor and the head of the Louisiana Department of Corrections.

9. Attached hereto as Exhibit A is a true and correct copy of an email I sent to Sheriff Theriot and District Attorney Duhe on August 24, 2018.

10. I also sent the same letter to the office of the Governor and to the Secretary of the Louisiana Department of Corrections, a true and correct copy of which is annexed hereto as Exhibit B.

11. I alerted these officials to the fact that Bayou Bridge Pipeline, LLC, did not have legal authority to be on the property and even shared with them the petition that Mr. Aaslestad filed to enjoin Bayou Bridge from further entering and constructing on the property.

12. I also shared with them the expropriation petition that Bayou Bridge Pipeline filed after it had already entered onto the land and begun constructing and which was still pending.

13. In these communications, I also advised these officials that the protesters “do not want to violate the law” and were “not out there to get arrested.”

14. I also represented Peter and Katherine Aaslestad and Theda Larson Wright when they were sued by the company for expropriation, which it only commenced after it had already begun construction on their property and after Mr. Aaslestad took them to court to get them off

the property. The Aaslestads and Wright also countersued for trespass and violation of their rights to due process.

15. The trial court found that Bayou Bridge knowingly and intentionally trespassed. The Third Circuit Court of Appeals later found that Bayou Bridge also violated their right to due process.

16. On March 22, 2019, I and my co-counsel in this matter, Pamela Spees, participated in panel at Tulane Law School, with Tyler Grey, then general counsel with LMOGA. During this panel presentation, Mr. Grey acknowledged that he drafted HB 727 and based it on the Oklahoma legislation, which had been urged by his counterparts at the Oklahoma Oil and Gas Association.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 18, 2022



WILLIAM P. QUIGLEY